

Environmental Resources
March 4, 1985
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Closure of Hazardous Waste Impoundment(s)
RCRA Groundwater Monitoring Requirements
Stanley C. Flagg & Company
Lower Pottsgrove Township, Montgomery County

JAMES A. DOLAN
Hazardous Waste Coordinator

MAR 6 1985

Thru: LAWRENCE R. LINNEY WATER
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Supervisor

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Hydrogeologist

As a follow-up to my inspection of the closed impoundment(s), conducted on January 28, 1985, during which the above matter was discussed with Pete Aldred, Plant Engineer, I recommend the establishment of a limited RCRA groundwater monitoring program. This request should be made a strict requirement of site closure.

Since the facility is currently involved in the abatement phase of monitoring, as per consent order and agreement with DEP, the standard requirement of four quarters of monitoring to establish background quality does not apply. Rather, to comply with Pa. Code 75.265(n)(2) and (9) monitoring for the entire series of RCRA parameters including zinc need only be conducted on a semi-annual basis for a period not to exceed one year unless analytical data suggests the need for continuation beyond the specified period.

As required by Pa. Code 75.265(n)(3)i and ii, the RCRA groundwater monitoring system shall consist of at least three (3) downgradient wells and one (1) upgradient well, therefore I recommend the following existing monitoring wells comprise the RCRA monitoring network: #11 (upgradient well), #14, 20 and 16 (downgradient wells). If for some reason, any one or a number of these wells can't be utilized for RCRA monitoring purposes, I would not be adverse to the selection of other wells in the vicinity of the impoundment(s).

A RCRA groundwater monitoring plan incorporating the above recommendations and consistent with the requirements of 75.265 (n),(7),(8) and (13) should be submitted to the DEP for review within 30 days of official notification.

cc: Dale Vojkin - Central Office
EPA - RCRA Enforcement Section ✓
Groundwater Monitoring File
Tim Sheehan
Re 30 BJ 47